

GUIDELINES FOR THE CONTROL OF HAZARDS OF ANIMAL HEALTH AND PUBLIC HEALTH IMPORTANCE IN ANIMAL FEED

PART 1

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DEFINITIONS

Hazard

means a biological, chemical or physical agent in, ~~or a condition of~~, feed or a feed ingredient with the potential to cause an adverse effect on animal or public health.

Rationale: The basis of the guidelines should be prevention of biological, chemical, and physical hazards. The definition of a hazard includes the words “condition of” which is redundant and confusing. Either one or more of the three hazards will be present or not—“condition” is not needed here.

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GENERAL PRINCIPLES

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Cross contamination

It is important to avoid cross-contamination during the manufacture, storage, distribution (including transport) and use of feed and feed ingredients and relevant provisions should be included in the regulatory framework. Scientific evidence, including the sensitivity of analytical methods and on the characterisation of risks, should be drawn upon in developing this framework.

Procedures, such as flushing, sequencing and physical clean-out, should be used to avoid cross-contamination between batches of feed or feed ingredients.

General Comment: The discussion of cross contamination should be presented as a potential pathway for how a hazard could be introduced to a feed or feed ingredient. As presented, it appears as a separate issue from hazard, which can be confusing.